

Policy / para Inspector's Matters	What the plan has said	What we have said	What Lichfield's response has been (see rep FC243 in CD1-5) http://www.hwa.uk.com/site/wp-content/uploads/2018/06/Submission-Document-List-31.05.18.pdf	Are we happy? If not, what do we want?	Is there an overlap with the Core Strategy Issues and Options?*	Action: - Support - Withdraw - Let rep stand - More evidence - Appear at Examination
Matter 1, question 1.3	Para 1.10 The Council is aware, and is committed to reviewing its Plan in full to address the Greater Birmingham Housing Market Area issues, specifically the shortfall in addressing the housing needs within this area.	a more explicit reference to this [Lichfield Local Plan] review should be made in the Local Plan Allocations Document itself there might also be scope to consider the possibility outlined in the [Greater Birmingham HMA Strategic] Growth Study of increasing densities on sites already allocated	Representation noted. Lichfield District forms part of the Greater Birmingham HMA and consideration will be given to outcomes of the Strategic Growth Study as part of the Local Plan Review. This is in line with paragraph 4.6 of the Local Plan Strategy which commits the Council to an early review of the Local Plan.	Happy with reference to local plan review but Allocations Plan does not address potential to increase densities on allocated sites	Yes	Let rep stand
Policy EMP1: Employment Areas & Allocations (Matter 7, question 7.3?)	Allocates for Use Class B1 (sites F2, A6 and OR6	We presume that the allocation is intended to be for B1(b) and B1(c) uses. The reasoned justification (paragraph 5.2) says that proposals for	<i>“Representation noted. Lichfield District forms part of the Greater Birmingham HMA and consideration will be given to outcomes of the Strategic Growth Study as part of the Local Plan Review. This is in line with paragraph 4.6 of the Local Plan Strategy which commits the</i>	Amendments to the plan for clarification.	Yes – we stated that <i>“If the retail and office requirements set out within the Local Plan Allocations document are to be</i>	Let rep stand

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		B1(a) offices should have regard to CP8 ('Our Centres'). However, this does not justify the unrestricted allocation for B1 uses in the first place, nor is it considered sufficient to ensure that offices are subject to the application of the 'town centre first' approach across the catchment area they serve.	<i>Council to an early review of the Local Plan. The Local Development Strategy sets out that the Council will commence the Local Plan Review in April 2018 and anticipates it will be adopted by 2020."</i> They therefore never really responded to the issues I raised.		<i>used as the basis for the Local Plan Review then Walsall requests that the comments we made in regards to these allocations in response to the Lichfield District Council Local Plan Allocations Focused Changes Consultation on the 19th February 2018 are considered as part of this consultation".</i>	
Policy Lichfield 3: Lichfield Economy and Policy Burntwood 3:	Site S1 is allocated for a mixed-use residential development	It does not appear there is evidence to justify provision for offices outside of the centres of Lichfield and	As above	Amendments to the plan for clarification.	As above	Let rep stand

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<p>Burntwood Economy</p> <p>Site S1 (Shenstone 1): Land at Lynn Lane, Shenstone</p> <p>(Matter 7, question 7.7 and 7.8)</p>	<p>within the Shenstone Neighbourhood Plan (Made 13 December 2016) to provide approximately 50 dwellings and 1000m2 of office/light industrial floor space (Class B1).</p>	<p>at Burntwood. Shenstone Neighbourhood Plane provides for the provision of offices and this is reflected the allocation of site S1 at Lynn Lane. It is considered that the floorspace provided through such 'additional' allocations should be subtracted from the overall quantum of offices to be provided that district's main centres, or that convincing evidence should be provided to justify additional offices without conflicts with policies to support existing centres,</p>				

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		including centres in surrounding areas.				
Site LC27 (Matter 7, question 7.7 and 7.8)	Site LC27 is allocated for 70 dwellings/bulky goods retail	Site LC27 (Former Norgren, Eastern Avenue) should have a clear definition of what would be acceptable under the definition of "bulky goods" and that the plan should set out in what circumstances the sequential and impact tests might be applied if / when other developments come forward in the catchment area, notably the Friarsgate development.	As above	Amendments to the plan for clarification.	As above	Let rep stand
Policy GT1 (matter 3, question 3.5)	Land at Bonehill Road, Mile Oak is allocated for one pitch	the number of traveller pitches to be allocated under	No response	Plan should allocate sufficient pitches to	Yes, because core strategy could re-	Let rep stand

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		policy GT1 does not appear to meet the need identified in the Local Plan Strategy, nor that reported in the 'Methodology Paper' of December 2016		meet identified need within the district	assess pitch requirement	

Your ref ADPD WC Response
Our ref
Ask for Ashley Baldwin
Email Ashley.baldwin@lichfielddc.gov.uk



District Council House, Frog Lane
Lichfield, Staffordshire WS13 6YX

Direct Line 01543 308192
Customer Services 01543 308000

FAO Planning Inspector

30 August 2018

Dear Helen,

Lichfield District Council Response to Walsall Council's Written Representation [M1/8]

Lichfield District Council (LDC) acknowledges that the points raised within Walsall Metropolitan Borough Council's (WMBC) written representation [M1/8] were raised in response to the Local Plan Allocations Focused Changes Consultation [Representation Reference: FC243]. LDC prepared a response to representations received as part of the Focused Changes consultation and would like to highlight to the Inspector that WMBC made no further contact to discuss the points raised with Lichfield District Council following the publication of those responses.

Further, following the submission of Walsall Council's written representation [M1/8], LDC attempted to make contact with Walsall Council to arrange a meeting to discuss the points further however no response was received from WMBC following the response sent from LDC on 4 August 2018 (Appendix A). Notwithstanding this, given that WMBC has decided not to appear at the Hearing Sessions, LDC has prepared a more detailed response to the points raised by Walsall to aid the Inspector during the Examination (Appendix B – green column). For clarity, whilst WMBC are critical in their response that LDC did not respond to each of the points raised within their representation, this does not mean these points have been overlooked by LDC.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Ashley Baldwin', written over a light blue horizontal line.

Ashley Baldwin
Spatial Policy & Delivery Manager
Economic Growth



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Appendix A – Email Correspondence between LDC & WC following submission of hearing statements

From: Baldwin, Ashley
Sent: 04 August 2018 20:09
To: Mike Smith (Strategic Planning) <Mike-E.Smith@walsall.gov.uk>
Subject: RE: DtC EiP session

Noted thanks Mike. Phonecall is fine, I am in an appeal on Tuesday, other than that I will be in most of the week.

Ash

Ashley Baldwin

Spatial Policy & Delivery Manager

Lichfield District Council

District Council House, Frog Lane, Lichfield, Staffordshire WS13 6YZ

T: 01543 308147

E: ashley.baldwin@lichfielddc.gov.uk

From: Mike Smith (Strategic Planning) [<mailto:Mike-E.Smith@walsall.gov.uk>]
Sent: 03 August 2018 19:11
To: Baldwin, Ashley <Ashley.Baldwin@lichfielddc.gov.uk>
Subject: RE: DtC EiP session

Hi Ashley,

Apologies for the delay in being able to come back to you.

I might have mentioned the DtC as a possible topic, but I was merely saying that we had a letter from your Programme Officer asking if we wanted to attend the Examination in respect of any of the issues. It's attached, but you've probably seen it.

At present we're just going through our reps and where things stand now. It isn't long until the deadline of the 17th, so we might want a phone conversation.

Regards,

Mike Smith
Planning Policy Manager
Regeneration and Development
Economy & Environment Directorate
Walsall Council
Civic Centre, Darwall Street, Walsall WS1 1DG
Email: SmithME@Walsall.gov.uk / Mike-E.Smith@walsall.gov.uk
Team Email: planningpolicy@walsall.gov.uk



Tel: 01922 658024
Fax: 01922 652670
Website: www.walsall.gov.uk

From: Baldwin, Ashley <Ashley.Baldwin@lichfielddc.gov.uk>
Sent: 12 July 2018 15:05
To: Mike Smith (Strategic Planning) <Mike-E.Smith@walsall.gov.uk>
Subject: DtC EIP session

CAUTION: This email originated from outside of the council. Do not click links or open attachments unless you are sure the content is safe.

Mike

Did you say earlier that you have been invited by our Inspector to a DtC session? The reason I ask is that I have not received anything to that effect.

Ash

Ashley Baldwin

Spatial Policy & Delivery Manager

Lichfield District Council

District Council House, Frog Lane, Lichfield, Staffordshire WS13 6YZ

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Appendix B – LDC response to points raised by Walsall Council [M1/8]

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Matter 1, question 1.3	Para 1.10 The Council is aware, and is committed to reviewing its Plan in full to address the Greater Birmingham Housing Market Area issues, specifically the shortfall in addressing the housing needs within this area.	a more explicit reference to this [Lichfield Local Plan] review should be made in the Local Plan Allocations Document itself there might also be scope to consider the possibility outlined in the [Greater Birmingham HMA Strategic] Growth Study of increasing densities on sites already allocated	Representation noted. Lichfield District forms part of the Greater Birmingham HMA and consideration will be given to outcomes of the Strategic Growth Study as part of the Local Plan Review. This is in line with paragraph 4.6 of the Local Plan Strategy which commits the Council to an early review of the Local Plan.	Happy with reference to local plan review but Allocations Plan does not address potential to increase densities on allocated sites	Yes	Let rep stand	The GBHMA shortfall will be dealt with through the Local Plan Review. The Local Development Scheme sets out the timeframe for the Review and anticipates it will be adopted by December 2020. Lichfield District Council have signed a Statement of Common Ground with Birmingham City Council which confirms it is an appropriate approach to deal with the HMA shortfall as part of the review process.
Policy EMP1: Employment Areas & Allocations (Matter 7, question 7.3?)	Allocates for Use Class B1 (sites F2, A6 and OR6)	We presume that the allocation is intended to be for B1(b) and B1(c) uses. The reasoned justification (paragraph 5.2) says that proposals for B1(a) offices should have regard to CP8 ('Our Centres'). However, this does not justify the unrestricted allocation for B1 uses in the first place, nor is it considered sufficient to ensure that offices are subject to the application of the 'town centre first' approach across the catchment area they serve.	<i>"Representation noted. Lichfield District forms part of the Greater Birmingham HMA and consideration will be given to outcomes of the Strategic Growth Study as part of the Local Plan Review. This is in line with paragraph 4.6 of the Local Plan Strategy which commits the Council to an early review of the Local Plan. The Local Development Strategy sets out that the Council will commence the Local Plan Review in April 2018 and anticipates it will be adopted by 2020."</i> They therefore never really responded to the issues I raised.	Amendments to the plan for clarification.	Yes – we stated that <i>"If the retail and office requirements set out within the Local Plan Allocations document are to be</i>	Let rep stand	Sites F2, A6 and OR6 are allocated for B1 / B2 / B8 uses. The allocation is intended to be flexible to enable employment uses to come forward. Sites A6 and OR6 have both received planning consent and construction is complete. Site F2 benefits from planning permission on part of the site and the remainder of the site is available for appropriate employment uses.

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Policy Lichfield 3: Lichfield Economy and Policy Burntwood 3: Burntwood Economy Site S1 (Shenstone 1): Land at Lynn Lane, Shenstone (Matter 7, question 7.7 and 7.8)	Site S1 is allocated for a mixed-use residential development within the Shenstone Neighbourhood Plan (Made 13 December 2016) to provide approximately 50 dwellings and 1000m2 of office/light industrial floor space (Class B1).	It does not appear there is evidence to justify provision for offices outside of the centres of Lichfield and at Burntwood. Shenstone Neighbourhood Plan provides for the provision of offices and this is reflected the allocation of site S1 at Lynn Lane. It is considered that the floorspace provided through such 'additional' allocations should be subtracted from the overall quantum of offices to be provided that district's main centres, or that convincing evidence should be provided to justify additional offices without conflicts with policies to support existing centres, including centres in surrounding areas.	As above	Amendments to the plan for clarification.	As above	Let rep stand	The Shenstone Neighbourhood Plan was made in December 2016. Policy CO2: Land at Birchbrook Industrial Estate supports the provision of B1 commercial development on the site as part of a residential – led mixed use development. Policy S1 of the ADPD reflects the relevant adopted Neighbourhood Plan policies. Given the nature of the site and the scale of development allocated through Policy S1 any office provision is like to be ancillary offices on an industrial estate.
Site LC27 (Matter 7, question 7.7 and 7.8)	Site LC27 is allocated for 70 dwellings/bulky goods retail	Site LC27 (Former Norgren, Eastern Avenue) should have a clear definition of what would be acceptable under the definition of "bulky goods" and that the plan should set out in what circumstances the sequential and impact tests might be applied if / when other developments come forward in the catchment area, notably the Friarsgate development.	As above	Amendments to the plan for clarification.	As above	Let rep stand	In accordance with the definition provided on planning portal, bulky goods is defined as goods of a large physical nature that sometimes require large areas for storage or display. It is not considered appropriate to be prescriptive and set out what would be acceptable under the definition of bulky goods within the ADPD. The approach towards retail assessments is set out within the Local Plan Strategy (Policy E1). The ADPD does not seek to introduce a new policy on circumstances where assessments may be required.



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Policy GT1 (matter 3, question 3.5)	Land at Bonehill Road, Mile Oak is allocated for one pitch	The number of traveller pitches to be allocated under policy GT1 does not appear to meet the need identified in the Local Plan Strategy, nor that reported in the 'Methodology Paper' of December 2016	No response	Plan should allocate sufficient pitches to meet identified need within the District.	Yes, because core strategy could re-assess pitch requirement.	Let rep stand	The Methodology Paper (2016) sets out the approach taken towards allocation sites. Page 6 includes Stage 4: Establishing a Final Schedule of Sites which sets out that three landowners were contacted and only one was willing to have their site allocation (Site GT 21 – 1 Pitch), therefore this is recommended as the only Gypsy and Traveller allocation. Policy GT1 is consistent with the recommendations of the Methodology paper.

